1 The Honorable Frederick P. Corbit Jun Dam (*Pro Se*) 5432 Geary Blvd #535 Chapter 7 2 San Francisco, CA 94121 3 Phone: (415) 748-1113 Email: jundam@hotmail.com 4 5 UNITED STATES BANKRUPTCY COURT 6 EASTERN DISTRICT OF WASHINGTON 7 8 9 Case No. 18-03197-FPC 10 NOTICE OF HEARING ON MOTION In re: TO INTERVENE AND MOTION TO 11 STAY PROCEEDINGS GIGA WATT INC., 12 Debtor **Hearing Information** 13 Date: January 22nd, 2025 14 Time: 1:30 p.m. **Location: Zoomgov.com** 15 Meeting ID: 160 692 2376 16 17 18 PLEASE TAKE NOTICE that a hearing on the Motion to Intervene and Motion to Stay 19 **Proceedings**, filed on 11/25/24, by Jun Dam, will be held as follows: 20 Date: January 22, 2025 21 Time: 1:30 p.m. Location: Zoomgov.com 22 Meeting ID: 160 692 2376 23 The hearing will address the following motions filed by Jun Dam in the above-captioned 24 bankruptcy case: 25 26

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## **Motion to Intervene:**

- Creditor holds a claim for 1,025,660 tokens, amounting to \$5,391,720.37, which is
  identical in legal and factual substance to claims listed in the Trustee's omnibus motion to dismiss
  creditor claims.
- Creditor was deliberately excluded from the Trustee's omnibus motion, despite being the largest token holder.
- The motion seeks to intervene as a matter of right under Fed. R. Civ. P. 24(a) or, alternatively, under permissive intervention (Fed. R. Civ. P. 24(b)) to protect Creditor's direct and substantial interest, prevent impairment of rights, and ensure adequate representation.

## **Motion to Stay Proceedings:**

- The Creditor seeks to stay proceedings on the Trustee's First Omnibus Objection to Claims until his claims are adjudicated or consolidated with the token-holder claims in the omnibus motion.
- Proceeding without including Creditor would result in inconsistent outcomes, inequitable treatment, and harm to judicial economy by encouraging piecemeal litigation.
  - A stay would ensure uniform and efficient resolution of all token-holder claims.

**Please take further notice** that parties wishing to participate in the hearing must join using the Zoom link provided or contact the court for additional instructions regarding remote attendance.

Dated: December 30, 2024

Respectfully submitted,

Jun Dam (*Pro Se*) 5432 Geary Blvd #535

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## **CERTIFICATE OF SERVICE**

I hereby certify that on 12/30/24 I electronically filed the foregoing **NOTICE OF HEARING ON MOTION TO INTERVENE AND MOTION TO STAY PROCEEDINGS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all ECF participants.

Date Served: 12/30/2024

Sign your name:

Print name: Jun Dam